

SEMI-ANNUAL COMPLIANCE STATUS REPORT

Prepared for:

**United States Department of Justice
Washington, D.C.**

**U.S. Environmental Protection Agency - Region 6
Dallas, Texas**

**U.S. Environmental Protection Agency – Region 7
Kansas City, KS**

Prepared by:

**Plains All American Pipeline, L.P.
Houston, Texas**

September 20, 2011

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1.0 Introduction

1.1 Report Purpose

This Semi-Annual Compliance Status Report has been prepared in compliance with Provision VI (Reporting Requirements) of the Consent Decree between the United States Environmental Protection Agency (EPA) and Plains All American Pipeline et al. al. (Plains) having an Effective Date of September 20, 2010. This provision of the Consent Decree requires that a semi-annual report be submitted to the United States Department of Justice and EPA Regions 6 and 7 summarizing the status of Plains' efforts towards compliance with Section V (Compliance Requirements) of the Consent Decree as well as the other specific reporting requirements of Section VI. This report covers the reporting period of March 1, 2011 to August 31, 2011.

1.2 Report Organization

The Semi-Annual Compliance Status Report sections are generally organized to follow the requirements of Section V (Compliance Requirements) of the Consent Decree. The reporting requirements of Section VI are addressed as specified by the Consent Decree within these report sections. For the purposes of this report, the capitalized term "Pipeline or Pipelines" has the definition presented in Sub-Paragraph III.9.Q. of the Consent Decree.

1.3 Period Covered by This Report

The Consent Decree requires that a semi-annual report be provided to EPA by no later than six months after the Effective Date of the Consent Decree and every six months thereafter until the Consent Decree terminates. Under that requirement, the time period to be covered by the first semi-annual report would have been the six month period preceding the date of the report. This presented a logistical problem in ensuring that the semi-annual compliance status report provided data and certifications that covered the reporting period specified without missing the reporting deadline. The timing specified in the Consent Decree required that the end of the reporting period match the semi-annual report deadline, which left no time to compile the required reporting data or prepare the report.

This issue was the subject of a telephone call with EPA Region 6 on February 24, 2011. During that call, it was agreed that the period covered by the first Semi-Annual Compliance Status Report would be from the Effective Date of the Consent Decree (September 20, 2010) until the end of the month preceding the reporting deadline. This agreement was documented in a follow-up e-mail from Nelson Smith (EPA, Region 6). Based on this agreement, the first Semi-Annual Compliance Status Report covered the period from September 20, 2010 to February 28, 2011 and was submitted by the Consent Decree-specified deadline of March 20, 2011. This Semi-Annual Compliance Status Report covers the period from March 1 to August 31, 2011.

1.4 Total Miles of Pipeline Purchased, Acquired, or Sold


During the reporting period covered by this Semi-Annual Compliance Status Report, and in accordance with Consent Decree Section VI, Sub-Paragraph 20.A., Item viii, Plains notifies the EPA that it has purchased or acquired a total of 5.41 miles of Pipeline and sold a total of 0 miles of Pipeline. A more detailed discussion of Pipeline segments purchased during the reporting period is provided in Section 2.1.4 of this report. A listing of the segments of Pipeline acquired during the reporting period is provided in **Attachment A-1** to this report.

1.5 Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on any personal knowledge I may have and my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Mark J. Gorman, Senior Vice President



Date

2.0 Consent Decree Compliance Status (*Consent Decree Section V*)

The following sections present a summary of the status of compliance with each of the Provisions of Section V of the Consent Decree (CD) as of August 31, 2011.

2.1 Enhanced Integrity Management and Corrosion Control

2.1.1 IMP Requirements for Category I, II-B and III-B Pipelines (CD Sub-Paragraph 15.A.)

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has assessed, operated and maintained all Category I, Category II-B and Category III-B Pipeline in accordance with the requirements of Plains' Integrity Management Plan (IMP), subject to the requirements of sub-paragraph 15.G. of the Consent Decree.

2.1.2 RSP Screening of Category II-A, III-A and IV Pipelines (CD Sub-Paragraph 15.B.)

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has assessed, operated and maintained all Category I, Category II-B and Category III-B Pipelines in accordance with the requirements of Plains' Risk Screening Program (RSP), subject to the requirements of sub-paragraph 15.G. of the Consent Decree.

During the reporting period covered by this Semi-Annual Compliance Status Report, Plains has developed and implemented Action Plans detailing risk mitigation actions to address the risks or other anomalies found during the RSP in accordance with the Risk Category Schedule in the RSP.

Plains maintains a database that tracks all pipeline segments subject to the RSP screening, their risk levels, the development of Action Plans and Elements and the implementation of the individual Action Elements. The Consent Decree requires that Plains report progress regarding the completion of any required milestones, including "...summaries of the RSP Action Plans required pursuant to sub-paragraph 15.B. and a

description of actions taken pursuant to the RSP Action Plans during the preceding six months.”

In this report, Plains provides summary tables that present a snapshot of the progress towards completion of Action Plans and Action Plan Elements developed under the RSP during the reporting period covered by this report. The first table (Attachment B-1) illustrates Plains’ progress towards the creation and approval of Action Plans emanating from the risk screening process. It is a report card that Plains uses to measure progress towards completion of required Action Plans based upon the initial risk screening and risk level assignment. This report card shows the number of Action Plans due to be completed during the reporting period (based upon the initial screening date and the risk level assignment, or subsequent reviews), the number completed, those instances where remedial measures were implemented in the event an Action Plan was not developed or approved within the program time limits, and the percent created and approved of the total due to be completed and approved. If the program is operating properly, this report card should show 100% completed and approved for each of the Districts for that reporting period.

A second summary table (Attachment B-2) is a listing of Action Plan Elements and the progress towards their completion. This table lists each Action Plan Element by its unique tracking number, the district, the pipeline segment name, risk level, the Action Plan Element Category, the status of the Action Plan Element, and the proposed and actual completion dates. As this is a dynamic process, the table presents only those action plan elements that are scheduled to be completed within the current semi-annual reporting period. As with the previous table, if the program is operating properly, at the end of each semi-annual reporting period, all of the Action Plan Elements due to be completed during that reporting period should have “CPL” (complete) noted under the status column.

2.1.3 Integrity Management of Category II and III Pipelines (CD Sub-Paragraph 15.C.)

During the reporting period covered by this Semi-Annual Compliance

Status Report, Plains has operated and maintained all Category II-A and Category III-A (Gathering) Pipelines in conformity with the safety requirements for rural gathering pipelines established in 49 CFR 195.11(b).

As of the Effective Date of the Consent Decree (9/20/10) and in accordance V.15.C.i.a. and b., Plains has:

- identified all Category II-A and III-A (Gathering) Pipeline Segments; and
- developed and implemented a continuing education program in conformity with 40 CFR 195.444.

As of July 3, 2010, Plains developed and implemented a corrosion control program in conformance with 49 CFR 195, Subpart H, in accordance with V.15.C.i.c.

As of the Effective Date of the Consent Decree (9/20/10) and in accordance V.15.C.ii.a., Plains has identified all Category II-B and III-B (Low Stress) Pipeline Segments. A listing of the Category II-B and III-B Pipeline segments is provided in the summary table included in Attachment C to the report.

In accordance with V.15.C.ii.b., Plains has completed baseline assessments required under Consent Decree provision V.15.C.ii.b. based on the total mileage of Category II-B and III-B Pipeline. As discussed in the previous semi-annual compliance status report dated March 15, 2011, baseline assessments were completed on 72.6% of the Category II-B and III-B Pipeline operated by Plains as of January 3, 2011. This complied with the Consent Decree requirement that baseline assessments be completed at least 50% of the Category II-B and III-B Pipelines by January 3, 2011.

Attachment C (Summary of Baseline Assessment Status Through August 31, 2011 for Class II-B and Class III-B Pipeline Segments) is a summary table listing the Pipeline segments covered by this provision of the Consent Decree and the status of baseline assessments for those segments through August 31, 2011. As of August 31, 2011, baseline

assessments had been completed on 98.4% of the Category II-B and III-B Pipeline operated by Plains as of the Effective Date of the Consent Decree (September 20, 2010).

Plains remains on track to complete all of the baseline assessments of the Category II-B and III-B Pipelines operated by Plains as of the Effective Date of the Consent Decree (September 20, 2010) as required by Sub-Paragraph V.15.C.ii.b. by July 3, 2013.

2.1.4 New Pipeline Acquisitions (CD Sub-Paragraph 15.D.)

Between February 28, 2011 and August 31, 2011, Plains acquired 12 segments of Pipeline. A listing of all of the new Pipeline acquisitions by segment, including the date of acquisition of each Segment, the Classification Category of each Segment (Class I, II-A, II-B, III-A, III-B and IV), the mileage of each Segment and whether centerline accuracy has been verified is provided in **Attachment A-1 – List of Pipelines Acquired During the Reporting Period**. All of the newly acquired Pipeline segments had adequate digital mapping, have been categorized in accordance with the Consent Decree criteria contained in Sub-Paragraph III.9.A-D., and have been centerline verified.

During the reporting period covered by this report, Plains did not sell any Pipeline segments.

During the reporting period covered by the summary table provided in **Attachment A-1**, all of the newly acquired Pipeline segments meet the Consent Decree criteria for Category IV Pipeline. All of these newly acquired Category IV Pipeline segments must be subject to initial screening under Plains' RSP within 12 months of the date of acquisition as required by Consent Decree Sub-Paragraph V.15.D.i. These segments were acquired on March 1, 2011 and will be screened under Plains' RSP by February 28, 2012.

In the previous semi-annual compliance status report dated March 15, 2011, Attachment A-1 contains two Pipeline segments that had been acquired on March 19, 2010 and January 1, 2011 and were thus due to be

screened under Plains' RSP by March 19, 2011 and January 1, 2012 respectively. These Pipeline segments (Eunice Gathering – VACA 14-3 – 4" and Robinson Lake Pipeline - Whiting Gas Plant to Stanley 8"), were screened under Plains' RSP on March 19, 2011 and July 13, 2011 respectively. This is documented in the RSP status reports for these Pipeline segment provided in **Attachment D**.

**2.1.5 Geographic information Systems (GIS) Mapping
(CD Sub-Paragraph 15.E.)**

Plains completed initial digital mapping and Centerline Verification of all Pipelines operated by Plains as of May 1, 2010. Initial digital mapping and Centerline Verification of these Pipelines was completed by July 1, 2010.

**2.1.6 Anode Beds, Internal Corrosion Control and Close Interval
Surveys (CD Sub-Paragraph 15.F.)**

As of the end of the reporting period (August 31, 2011), Plains spent a total of \$6,596,916 (\$3,808,073 in 2010 and \$2,788,842 through August 31st in 2011) on activities to mitigate threats posed by corrosion of Plains' Pipelines. In accordance with the Consent Decree, Plains has conducted a program of anode bed and rectifier replacement or installation, installation of equipment to inject corrosion inhibitor and biocides for internal corrosion control, and performance of close interval surveys. **Attachment E** provides a summary table illustrating Plains' progress in meeting the specific compliance requirements of Sub-Paragraph V.15.F.

**2.1.7 Subsequent Revisions to Plains' IMP or RSP
(CD Sub-Paragraph 15.G.)**

No material changes to Plains' IMP or RSP have been made during the reporting period.

2.2 Enhanced Pipeline Leak Detection (Consent Decree Paragraph 16)

2.2.1 Weekly Aerial Patrols (CD Sub-Paragraph 16.A.)

All active Category I, II-A, II-B, and III-B Pipelines (including all Category I, II-A, II-B and III-B Pipeline acquired since the September 20, 2010) and those active Pipelines listed in Appendix A of the Consent Decree have been the subject of a weekly aerial, motor vehicle or foot patrol (weather permitting) in accordance with the requirements of Sub-Paragraph 16.A. of the Consent Decree.

2.2.2 Implementation of API 1130 Compliant CPM Detection (CD Sub-Paragraph 16.B.)

All active (in service) Pipeline segments listed in Appendix B of the Consent Decree comply with the performance standards for Computational Pipeline Monitoring (CPM) Leak Detection set forth in API RP 1130. During the reporting period covered by this report, Plains identified 30 additional Pipeline Segments for installation of CPM equipment as required by Sub-Paragraph V.16.C.1 of the Consent Decree. As of the date of this report, all of these 30 additional pipeline segments comply with the performance standards for Computational Pipeline Monitoring (CPM) Leak Detection set forth in API RP 1130. This is well in advance of the December 31, 2011 deadline stipulated by Sub-Paragraph V.16.C.1 of the Consent Decree.

2.2.3 Enhancement of API 1130 Compliant CPM Leak Detection and Minimization of Slack-Line Operations (CD Sub-Paragraph 16.C.)

The Consent Decree requires that an investigation of specific Pipeline Segments listed in Appendix B of the Consent Decree (as well as any Segments added to the Computation Pipeline Monitoring pursuant to Sub-Paragraph 16.B.) be the subject of an investigation that is designed to identify potential enhancements to Plains' leak detection capabilities and measures to minimize Slack-Line Operations or mitigate the effects

of Slack-Line Operations on the CPM leak detection systems on those Pipeline Segments.

It also requires that Action Plans be developed based upon the findings of the investigations described above, which will include one or more of the measures identified in 16.C.i.b.5. and any other actions Plains may take to improve the leak detection system and/or minimize Slack-Line Operations.

The following sections summarize Plains' activities conducted in compliance with these requirements.

2.2.3.1 Investigation

Plains has completed the investigations specified in Sub-Paragraph V.16.C.i. evaluating the extent of Slack-Line Operations for all active (in service) Pipeline segments listed in Appendix B of the Consent Decree. Plains has also migrated each of these segments to the Telvent Oasis DNA Pipeline Monitoring (PLM) CPM application used in Plains' Midland, TX Operational Control Center in accordance with Sub-Paragraph V.16.C.i.a.

A table summarizing the current CPM compliance status of each of these segments along with the findings from the investigation of each segment is presented in **Attachment F-1**.

In addition, Plains has identified 30 additional pipeline segments as required by Sub-Paragraph V.16.B. of the Consent Decree. Plains completed the evaluation of the extent of Slack-Line Operations for these additional pipeline segments in accordance with Sub-Paragraph V.16.C.i.b. during the period covered by this report. Plains has also migrated each of these segments to the Telvent Oasis DNA Pipeline Monitoring (PLM) CPM application used in Plains' Midland, TX Operational Control Center in accordance with Sub-Paragraph V.16.C.i.a.

A table summarizing the current CPM compliance status of each

of these segments along with the findings from the investigation of each segment is presented in **Attachment F-2**.

Subsequent to the submittal of the first semi-annual report on March 15, 2011, Plains noticed errors in the information presented in Attachment F. These errors and Plains' response to them are discussed in more detail in Section 3.0 (Compliance Problems During the Reporting Period). Attachment F in this report has been corrected to address the identified errors.

2.2.3.2 Action Plans

Plains has developed or is developing Action Plans based upon the findings of the investigations discussed in the previous section in accordance with Sub-Paragraph V.16.C. of the Consent Decree. Of the 110 Pipeline segment investigations conducted to-date (80 segments from Appendix B and 30 additional segments identified by Plains), a total of 27 concluded that no actions need be taken. The remaining 83 Pipeline segment investigations concluded that an Action Plan needed to be developed and implemented. As of the reporting deadline for this report (August 31, 2011), 46 Action Plans were developed and have been completed, 30 Action Plans were developed and their implementation is in progress, and 7 Action Plans are scheduled for development by the March 31, 2012 deadline stipulated by the Consent Decree. A summary of the development and implementation status of these Action Plans is also included in the summary table presented in **Attachments F-1** (for the Appendix B Pipeline segments) and **F-2** (for the additional 30 Pipeline segments).

2.3 Requirements for Replacement and/or Substitute Breakout Tanks (Consent Decree Paragraph 17)

Plains complies with the requirements of this paragraph of the Consent Decree through its Management of Change (MOC) process. A Management of Change (MOC) form is required for any activity requiring the use of a substitute or breakout tank. If a substitute or breakout tank is required, an evaluation of the substitute or breakout tank storage volume adequacy and an evaluation of the

adequacy of the secondary containment must be reviewed and verified by those Plains personnel approving the MOC form.

2.4 Personnel and Training (Consent Decree Paragraph 18)

2.4.1 Position Preservation (CD Sub-Paragraph 18.A.)

During the reporting period covered by this semi-annual report, Plains has staffed and preserved the positions listed in Sub-Paragraph V.18.A of the Consent Decree.

2.4.2 Employee Training (CD Sub-Paragraph 18.C. and 18.D.)

During the reporting period covered by this semi-annual report, all personnel assigned to operate and maintain Category III-A and IV Pipelines have been trained or maintained their training in conformity with the Operator Qualification requirements of 40 CFR 195.

During the reporting period covered by this semi-annual report, twenty-eight (28) new pipeline controller applicants were pre-screened using a computer simulator-based console operator assessment (Cobra).

As of December 31, 2010 Plains has trained field personnel performing Pipeline maintenance in proper Pipeline cleaning techniques and procedures. As new employees are hired this training is included in their on-going training.

2.5 Permits (Consent Decree Paragraph 19)

No federal, state or local permit or approval was required to fulfill any compliance obligation in Section V of the Consent Decree during the reporting period of this report that would require, or have the potential to require Plains

to seek relief under the provisions of Section VIII (Force Majeure) of the Consent Decree.

3.0 Compliance Problems During the Reporting Period

3.1 Problems Identified During the Reporting Period

Problem #1 - Baseline Assessment Oversight

Pipeline Segment Name:	Nettleton to Bumpas Sweet 6"
Pipeline Segment Length:	3500 feet
District:	Kilgore
Consent Decree Categorization:	Class I

This pipeline segment was identified as Class I during the initial categorization of all pipeline segments in accordance with the Consent Decree in 2006. At the time of categorization, there was no hydrostatic test or ILI data found for this segment, so it was scheduled for a baseline assessment hydrostatic test in 2007. In December 2007, a search of the District office files found documentation of a hydrostatic test of this pipeline segment that had been completed and certified on June 6, 2005. As a result, a hydrostatic test was not conducted on this pipeline segment in 2007. The IMP assessment tracking spreadsheet was amended to reflect that this segment had been tested on June 6, 2005 and would need to be tested again by June 6, 2010 (5-yrs). PHMSA regulations state that pipeline segment assessments must be completed within eight months of the 5-year regulatory deadline, thus extending the deadline for the segment to February 6, 2011. Due to a human oversight, a hydrostatic test was not conducted on this segment before the February 6, 2011 deadline.

This oversight was discovered during a quarterly update of the IMP assessment tracking spreadsheet on Wednesday, March 16, 2011. On that same day (March 16th), it was verified that the pipeline segment had not been re-assessed by the February 6, 2011 deadline. A hydrostatic test was ordered for this pipeline segment on Thursday, March 17, 2011. The test of this segment was initiated on Friday, March 18, 2011 and completed (and certified) on Saturday, March 19, 2011. The pipeline segment was determined to be fit for use and in compliance with Plains' IMP on March 19th.

Problem #2 - Attachment F to First Semi-Annual Compliance Status Report

Attachment F to the Semi-Annual Compliance Status Report summarizes Plains' compliance with Subparagraph 16.C. of the Consent Decree, specifically the requirements concerning the minimization of slack-line operations. Attachment F provides a summary of the findings of slack line investigations of the pipeline segments listed in Appendix B of the Consent Decree as well as 30 additional

pipeline segments identified by Plains. The attachment also provides the status of the development and implementation of action plans to minimize slack-line operations in these pipeline segments.

During the reporting period covered by this report, it was discovered that some of the information provided in this Attachment in the first semi-annual compliance status report was erroneous. Specifically, the following errors were found and corrected in the version of Attachment F to this semi-annual compliance status report:

Attachment F Line No. 5
Pipeline Segment: LN2000/63

The Action Taken for this pipeline segment was misreported in the first semi-annual compliance status report dated March 15, 2011. It has been correctly reported in Attachment F to this report.

Attachment F Line No. 6
Pipeline Segment: RP_STSRP_RCTRP

The Action Taken for this pipeline segment was misreported in the first semi-annual compliance status report dated March 15, 2011. It has been correctly reported in Attachment F to this report.

Attachment F Line No. 11
Pipeline Segment: RR_HLD_RCS

The Shut-In Slack and Refill Time for this pipeline segment was misreported in the first semi-annual compliance status report dated March 15, 2011 due to a pipeline configuration change. This data is correctly reported in Attachment F to this report. This correction did not change the action plan for this segment.

Attachment F Line No. 59
Pipeline Segment: PG_10GPG_LAKPG

It should have been noted in Attachment F in the first semi-annual compliance status report that this pipeline segment had been broken into two sub-segments for the purposes improving the fidelity of the leak detection on that segment.

There is no change in any of the data provided for these segments between the first semi-annual compliance status report and this report.

No other problems were identified during the reporting period.

3.2 Implemented or Planned Solutions to Problems Identified During the Reporting Period

Problem #1 - Baseline Assessment Oversight

As discussed in Section 3.1 above, the baseline assessment oversight that was identified on March 16, 2011, was corrected by conducting a hydrostatic test of the pipeline segment on March 18-19, 2011. The hydrostatic test was successfully completed within three days of problem identification and confirmed that the pipeline was fit for service and in compliance with Plains' IMP.

The reason for the oversight was human error in reviewing the listing of pipeline segments due for assessment during the reporting period. To address this problem and minimize the potential for re-occurrence, PAA has implemented an online database application for tracking IMP assessments. Assessment statuses are now updated in the application by integrity personnel as they are completed, instead of on a quarterly basis. The current status of any assessment is available for viewing and reporting by pertinent PAA integrity and operations employees at all times. In addition, the application sends out email notifications every 60, 30, 14 and 1 day(s) prior to the due date of an assessment that has not been completed. These notifications are received by integrity personnel and the applicable District and Assistant Division Managers for the segment.

Problem #2 - Attachment F to First Semi-Annual Compliance Status Report

The responses to the identification of misreported data, and clarifications to the Attachment F table between the first semi-annual compliance status report and this report are summarized in Section 3.1.

4.0 Consent Decree Violations or Force Majeure Events

During the reporting period covered by this Semi-Annual Compliance Status Report, no Force Majeure Events occurred.

As discussed in more detail in Section 3.1 and 3.2 above, as a result of human error Plains failed to complete the baseline assessment of a 3500-foot Pipeline segment within the timeframe stipulated by Plains' IMP and applicable PHMSA regulations. The baseline assessment was performed immediately upon discovery of the error, with no adverse consequences resulting from the delay.

ATTACHMENT A-1

**List of Pipelines Acquired During the
Reporting Period**

ATTACHMENT A-1

List of Pipelines Acquired and Sold During the Reporting Period March 1, 2011 through August 31, 2011

Plains District	Pipeline System Name	Segment Name	Route ID	Segment Length (miles)	Pipeline Category	Status Code	Previous Operator	Date Acquired	Centerline Accuracy Verified?
Permian Pipeline South	Thomas Gathering	JAMES RANCH #17 - 4"	11678	0.004	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #19 - 4"	11680	0.044	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #19 - 6"	11680	0.770	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #36 - 4"	11675	0.040	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #36 - 6"	11675	0.422	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #55 - 4"	11667	0.005	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #55 - 6"	11667	3.090	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #55 - 6"	11722	0.045	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #7-30 - 4"	11673	0.053	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #7-30 - 4"	11676	0.010	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #7-30 - 6"	11673	0.268	IV	Active	BOPCO	3/1/2011	Y
Permian Pipeline South	Thomas Gathering	JAMES RANCH #7-30 - 6"	11676	0.655	IV	Active	BOPCO	3/1/2011	Y
Total Pipeline Mileage Acquired During Reporting Period				5.41					
Total Class IV Mileage				5.41					

ATTACHMENT A-2

**List of Pipelines Sold During the Reporting
Period**

No Pipeline segments were sold during the reporting period. (March 1, 2011 through August 31, 2011)

ATTACHMENT B-1

**Status of Action Plan Development and
Implementation under the Risk Management Program
(RMP)**

**Risk Screening Program Action Plan
Creation Report Card**

RSP District Report Card
Reporting Period: 03/01/2011 - 08/31/2011

(Plan Preparation & Approval)						
ACTION PLAN CREATION - Number of Action Plans to create & approve for this Reporting Period						
District	Due for Creation	Approved on Time	AP's With Due Dates Between Today and 08/31/11	Remedial Action Taken or Approved within 30 Days	% Created & Approved w/ in Program Guidelines	Comments
Abbeville	0	0	0	0	100%	
Bakersfield	1	1	0	0	100%	
Belfield	8	8	0	0	100%	
Casper	0	0	0	0	100%	
Colorado City	1	1	0	0	100%	
Cushing	0	0	0	0	100%	
East Cst Terminal	2	2	0	0	100%	
Evanston	1	1	0	0	100%	
Heidelberg	0	0	0	0	100%	
Houston	0	0	0	0	100%	
Kilgore	0	0	0	0	100%	
Long Beach	0	0	0	0	100%	
Midland Basin	0	0	0	0	100%	
Permian E	12	12	0	0	100%	
Permian N	13	10	0	3	100%	AP's approved during remedial measures development period (30 days)
Permian S	12	11	0	1	100%	AP approved during remedial measures development period (30 days)
Russell	23	23	0	0	100%	
Wichita Falls	0	0	0	0	100%	
Totals	73	69	0	4	100%	

ATTACHMENT B-2

**Status of Action Plan Development and
Implementation under the Risk Management Program
(RMP)**

Action Plan Element Implementation Status

AP Elements Completed 3/1/11- 8/31/11

Displaying records 1 - 105

Number of records 105

Action Plan Element	District Name	Pipeline Segment Name	Risk Level	AP Element Category	AP Status	Actual Completion Date
306	Colorado City	W Spraberry MTR 1250	III	Conduct Hydro	CPL	3/23/2011
1204	Evanston	Burly	III	Conduct Hydro	CPL	6/7/2011
1206	Evanston	LaBarge Gathering 6"	III	Conduct Hydro	CPL	6/9/2011
1213	Evanston	Taylor Trucks (LaBarge Gath)	III	Conduct Hydro	CPL	6/14/2011
3845	Colorado City	Forsan - Iatan Suction line	III	Conduct Hydro	CPL	8/19/2011
3939	Evanston	BNG 3 (LaBarge Gath)	IV	Conduct Hydro	CPL	6/9/2011
3945	Evanston	Chevron E (LaBarge Gath)	IV	Conduct Hydro	CPL	6/16/2011
3948	Evanston	GRB-2 (LaBarge Gath)	IV	Conduct Hydro	CPL	6/17/2011
3951	Evanston	GRB-4 (LaBarge Gath)	IV	Conduct Hydro	CPL	7/20/2011
3969	Cushing	Enerwest Truck 6"	III	Conduct Hydro	CPL	6/7/2011
3974	Cushing	Lenora - Seiling	III	Conduct Hydro	CPL	6/7/2011
381	Colorado City	Shell to Forsan 6"	II	Conduct ILI	CPL	5/17/2011
1429	Permian E	Owens Truck 4"	II	Conduct ILI	CPL	4/18/2011
1721	Permian E	South Cross Tie In to S El Cinco	II	Conduct ILI	CPL	3/2/2011
2766	Belfield	Lone Butte ML 6"	III	Conduct ILI	CPL	6/15/2011
3022	Cushing	33 Trap - Cashion	III	Conduct ILI	CPL	3/31/2011
3235	Colorado City	Colorado City to China Grove 10" #3	III	Conduct ILI	CPL	4/28/2011
3237	Colorado City	China Grove to Colorado City Link 10" #1	III	Conduct ILI	CPL	4/28/2011
3461	Cushing	Pike to Tussy	III	Conduct ILI	CPL	5/31/2011
3463	Cushing	Tatum to H&M Corner	III	Conduct ILI	CPL	5/31/2011
3560	Permian N	Anderson Ranch to 34 Junction	III	Conduct ILI	CPL	4/19/2011
3562	Permian N	34 Junction to Lea Station	III	Conduct ILI	CPL	4/19/2011
3569	Permian S	Quito ML (w/ University 21-18 Leases)	III	Conduct ILI	CPL	3/15/2011
3837	Casper	LACT 11	III	Conduct ILI	CPL	5/16/2011
3839	Casper	LACT 20	III	Conduct ILI	CPL	6/15/2011
3841	Casper	Sussex Sta to Sussex Jct	IV	Conduct ILI	CPL	5/16/2011
3843	Casper	Sussex B2 to Sussex Stn	III	Conduct ILI	CPL	5/16/2011
3858	Permian E	Amacker to McElroy	I	Conduct ILI	CPL	5/5/2011
3915	Permian S	Dollarhide North Gath	II	Conduct ILI	CPL	5/3/2011
3977	Cushing	Seiling - Orion	III	Conduct ILI	CPL	6/7/2011
4006	Bakersfield	Seneca Star to Aera Lost Hills	IV	Conduct ILI	CPL	3/8/2011
4009	Bakersfield	Cahn lateral	IV	Conduct ILI	CPL	3/8/2011
4012	Bakersfield	31X 8"	III	Conduct ILI	CPL	4/15/2011
4019	Bakersfield	26C	IV	Conduct ILI	CPL	3/29/2011
4227	Permian E	Owens Truck 6"	II	Conduct ILI	CPL	4/18/2011
379	Colorado	Shell to Forsan 6"	II	Evaluate & Enhance	CPL	7/10/2011

	City			Cleaning Pig Program		
2764	Belfield	Lone Butte ML 6"	III	Evaluate & Enhance Cleaning Pig Program	CPL	6/15/2011
3946	Evanston	Chevron E (LaBarge Gath)	IV	Evaluate & Enhance Cleaning Pig Program	CPL	6/16/2011
3947	Evanston	GRB-2 (LaBarge Gath)	IV	Evaluate & Enhance Cleaning Pig Program	CPL	6/17/2011
3949	Evanston	Taylor Trucks (LaBarge Gath)	III	Evaluate & Enhance Cleaning Pig Program	CPL	6/14/2011
3952	Evanston	GRB-4 (LaBarge Gath)	IV	Evaluate & Enhance Cleaning Pig Program	CPL	7/12/2011
3012	Permian S	Dollarhide North Gath	II	Evaluate & Enhance CP	CPL	5/13/2011
3013	Permian S	Obrien 16	I	Evaluate & Enhance CP	CPL	3/28/2011
4182	Heidelberg	Green Line 6"	III	Evaluate & Enhance CP	CPL	4/20/2011
4187	Heidelberg	Laurel 6"	III	Evaluate & Enhance CP	CPL	4/20/2011
4194	Heidelberg	Creola 8"	III	Evaluate & Enhance CP	CPL	5/3/2011
4197	Heidelberg	Unocal to Y Station	III	Evaluate & Enhance CP	CPL	5/3/2011
4202	Heidelberg	Churchula to Unocal 8"	III	Evaluate & Enhance CP	CPL	5/3/2011
4204	Heidelberg	Holiday Creek P/L	III	Evaluate & Enhance CP	CPL	4/12/2011
4205	Heidelberg	Laurel Tie-in to Eucutta 8"	III	Evaluate & Enhance CP	CPL	4/20/2011
4211	Heidelberg	Prairie Branch	IV	Evaluate & Enhance CP	CPL	4/20/2011
4210	Heidelberg	Nancy Line	III	Evaluate & Enhance CP	CPL	4/20/2011
4209	Heidelberg	McCarty	III	Evaluate & Enhance CP	CPL	4/20/2011
4235	Heidelberg	Green Line 4"	III	Evaluate & Enhance CP	CPL	4/20/2011
3559	Permian E	Iraan to Midland Extension 12"	III	Evaluate & Enhance Inhibitors or Biocides	CPL	4/21/2011
1711	Permian E	Several Idle Segments - Uncertain if Purged	IV	Idle Isolate Purge	CPL	3/21/2011
2239	Permian S	Vacuum - Basin 14/16"	IV	Idle Isolate Purge	CPL	3/23/2011
3574	Permian S	WDDU to Launcher	IV	Idle Isolate Purge	CPL	4/20/2011
3575	Permian S	WDDU (piggable segment)	IV	Idle Isolate Purge	CPL	4/20/2011
3576	Permian S	Justice(south)	IV	Idle Isolate Purge	CPL	4/20/2011
3674	Permian S	Devon Baird to 6" (Sour)	IV	Idle Isolate Purge	CPL	3/31/2011
3848	Russell	Elsasser to Beller D	II	Idle Isolate Purge	CPL	5/6/2011
3930	Colorado City	Chalk Otis E/O	IV	Idle Isolate Purge	CPL	5/13/2011
3941	Evanston	Saddle Ridge(LaBarge Gath)	IV	Idle Isolate Purge	CPL	7/19/2011
3943	Evanston	Tract 8 (LaBarge Gath)	IV	Idle Isolate Purge	CPL	7/7/2011
3950	Evanston	Chevron D (LaBarge Gath)	IV	Idle Isolate Purge	CPL	7/7/2011
3954	Evanston	Rainbow (Pinedale Hand Run)	III	Idle Isolate Purge	CPL	7/6/2011
3961	Evanston	Wold	III	Idle Isolate Purge	CPL	5/19/2011
4031	Abbeville	Patterson Dock Line	III	Idle Isolate Purge	CPL	6/28/2011
4085	Permian S	Hugh Sta Discharge	IV	Idle Isolate Purge	CPL	3/31/2011
4086	Permian S	Eubank Pump - Hugh Sta	IV	Idle Isolate Purge	CPL	3/31/2011
4201	Heidelberg	Churchula to Unocal 8"	III	Idle Isolate Purge	CPL	7/27/2011
4364	Russell	Leikam 2" (w/ laterals)	IV	Idle Isolate Purge	CPL	8/26/2011
4365	Russell	Weigel Weigel	IV	Idle Isolate Purge	CPL	8/26/2011

4366	Russell	Dickenson (w/ laterals)	IV	Idle Isolate Purge	CPL	8/26/2011
3315	Permian E	Waddell W 39 Sta - Sandhills Sta	III	Other	CPL	6/15/2011
3455	Permian S	FM1882 4" Crossing	III	Other	CPL	3/21/2011
3533	Permian S	Estes Tie-in to Estes Pump	III	Other	CPL	4/15/2011
3556	Russell	NWAU #1 - Greeley	II	Other	CPL	3/29/2011
3564	Permian S	Obrien 16	I	Other	CPL	3/30/2011
3831	Permian E	Amacker to McElroy	I	Other	CPL	4/20/2011
3928	Colorado City	Colorado City to China Grove 10" #3	III	Other	CPL	5/25/2011
3940	Evanston	Saddle Ridge(LaBarge Gath)	IV	Other	CPL	6/29/2011
3942	Evanston	Tract 8 (LaBarge Gath)	IV	Other	CPL	6/29/2011
3966	Cushing	Tatum to H&M Corner	III	Other	CPL	6/7/2011
3968	Cushing	Alma Corner Jct to Tussy	II	Other	CPL	6/7/2011
4000	Permian N	Giles to Scharb 8" (WTS)	III	Other	CPL	8/23/2011
631	Belfield	Marmath to Doc Tom's 6"	III	Rehab or Replace Pipe	CPL	7/6/2011
1389	Permian E	Sandhills to Crane East 8"	III	Rehab or Replace Pipe	CPL	8/18/2011
1404	Permian E	McElroy - Crane West	IV	Rehab or Replace Pipe	CPL	3/21/2011
1462	Permian E	University 26 Pump to Coates Tie In	III	Rehab or Replace Pipe	CPL	6/30/2011
1752	Permian E	Amacker 105	III	Rehab or Replace Pipe	CPL	5/5/2011
1837	Permian N	Prentice Draw 10"		Rehab or Replace Pipe	CPL	3/31/2011
1879	Permian N	Wasson Basin to Wasson	III	Rehab or Replace Pipe	CPL	4/30/2011
2628	Russell	Ness to Hodgeman	III	Rehab or Replace Pipe	CPL	5/18/2011
2708	Belfield	Marmath to Baker 8"	III	Rehab or Replace Pipe	CPL	7/6/2011
2710	Belfield	Whitetail ML	III	Rehab or Replace Pipe	CPL	7/6/2011
3236	Colorado City	Colorado City to China Grove 10" #3	III	Rehab or Replace Pipe	CPL	5/25/2011
3400	Bakersfield	M 55	III	Rehab or Replace Pipe	CPL	5/31/2011
3557	Permian S	Windham Wildfire 6" ML	III	Rehab or Replace Pipe	CPL	3/11/2011
3568	Permian N	10" Wasson CO2 to Wasson Station	II	Rehab or Replace Pipe	CPL	3/30/2011
3573	Permian S	Foster Johnson Mtr 6	III	Rehab or Replace Pipe	CPL	5/19/2011
3919	Permian N	Prentice Draw 10"		Rehab or Replace Pipe	CPL	8/31/2011
3953	Evanston	GRB-3 (LaBarge Gath)	IV	Rehab or Replace Pipe	CPL	6/27/2011
4084	Colorado City	East Ackerly Dean 229 - ML Tie In (w/ leases)	III	Rehab or Replace Pipe	CPL	7/31/2011

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ATTACHMENT C

**Summary of Baseline Assessment Status for Class II-
B and Class III-B Pipeline Segments
August 31, 2011 Status Summary**

Through August 31, 2011

Page 1 of 1

ATTACHMENT D

**RSP Screening Summary for Pipelines
Acquired During Reporting Period
March 1, 2010 through August 31, 2011**



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103-Pitchfork Gath & Thomas ML

Information

RSP Risk Screening Log Name	103-Pitchfork Gath & Thomas ML	Owner	P/L Integrity
Risk Screening Log ID	103	Meeting Date	3/19/2010
Region	Western Region	Division	SW
District	Permian S		

Risk Screening Meeting Log

Pipeline System	New Mexico Gathering	Pipeline Subsystem	Pitchfork Gath & Thomas ML
State	NM	County/Parrish	Lea
Meeting Location	Net meeting		

System Information

Created By	Lydia Bennett, 5/14/2010 10:46 AM	Last Modified By	Lydia Bennett, 5/14/2010 10:46 AM
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RSP Pipeline Segments

Thomas to Pitchfork 8" (Route ID 1767)

Pipeline Segment ID	01
Review Date	3/19/2010

Red Hills # 1 to 8" tie in (Route ID 10255)

Pipeline Segment ID	02
Review Date	3/19/2010

Red Hills # 12 to 8" tie in (Route ID 10254)

Pipeline Segment ID	03
Review Date	3/19/2010

Vaca Junction to 8" tie in (Route ID 10253)

Pipeline Segment ID	04
Review Date	3/19/2010

Vaca 14-3 to Vaca junction (Route ID 10976)

Pipeline Segment ID	05
Review Date	3/19/2010

Rojas to Vaca Junction (Route ID 11610)

Pipeline Segment ID	06
Review Date	7/21/2011

Falcon 25 to Red Hills #1 (Route ID 11622)

Pipeline Segment ID	07
---------------------	----

Review Date 7/21/2011

RSP Risk Screening Log History

5/14/2010 10:46 AM

User Lydia Bennett

Action Created.

RSP Action Plans

Red Hills # 1 to 8" tie in - 2010/03/19

Red Hills # 12 to 8" tie in - 2010/03/19

Thomas to Pitchfork 8" - 2010/03/19

Vaca 14-3 to Vaca junction - 2010/03/19

Vaca Junction to 8" tie in - 2010/03/19

Rojas to Vaca Junction - 2012/7/20

Falcon 25 to Red Hills #1 - 2012/7/20

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123-Robinson Lake

Information

RSP Risk Screening Log Name	123-Robinson Lake	Owner	P/L Integrity
Risk Screening Log ID	123	Meeting Date	7/13/2011
Region	Western Region	Division	RM
District	Belfield		

Risk Screening Meeting Log

Pipeline System	Robinson Lake Pipeline	Pipeline Subsystem	Whiting Gas Plant to Stanley
State	ND	County/Parrish	Mountrail
Meeting Location	Belfield		

System Information

Created By	Greg Yant, 7/13/2011 4:12 PM	Last Modified By	Greg Yant, 7/13/2011 4:45 PM
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RSP Pipeline Segments

Robinson Lake to Stanley (Route_ID 11636)

Pipeline Segment ID 01

Review Date 7/13/2011

RSP Risk Screening Log History

7/13/2011 4:12 PM

User Greg Yant

Action Created.

RSP Action Plans

Robinson Lake to Stanley - 2012/7/12

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ATTACHMENT E

Summary of Expenditures Associated with Consent Decree Section V.15.F. (Anode Beds, Internal Corrosion Control and Close Interval Surveys)

ATTACHMENT E

Summary of Expenditures Associated with Consent Decree Sectionn V.15.F.

	Number Installed/Replaced 2010 ¹	Number Installed/Replaced Jan 1 - Aug 16, 2011 ²	Cummulative Number Installed/Replaced to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to Aug 16, 2011
Anode Bed/ Rectifier Installation	89	35	124	120	\$2,335,919	\$2,076,468	\$4,412,387

	Number Installed 2010 ¹	Number Installed Jan 1 - Aug 16, 2011 ²	Cummulative Number Installed to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to Aug 16, 2011
Corrosion Inhibitor/ Biocide Injection	76	29	105	None	\$35,329	\$183,206	\$218,535

	Miles Completed 2010 ¹	Miles Completed Jan 1 - Aug 16, 2011 ²	Miles Completed to Date (Aug 16, 2011)	Consent Decree Goal	Total Expenditures 2010	Total Expenditures 2011 (Jan 1st - Aug 16th)	Total Expenditures 2010 to August 16, 2011
Close Interval Surveys	1921	483	2404	2400	\$1,436,825	\$529,168	\$1,965,993

¹ - As of December 20, 2010 Monthly Report

² - As of August 16, 2011 Monthly Report

Total Cummulative Expenditures on All V.F. Items (through February 28, 2011)	\$6,596,916
Consent Decree Goal	\$6,000,000
% of Goal	109.95%

ATTACHMENT F

Leak Detection and Slack Line Operations Investigation and Action Plan Development and Implementation Status

ATTACHMENT F-1

Leak Detection and Slack Line Operations Investigation and Action Plan Development and Implementation Status- Appendix B Pipeline Segments

ATTACHMENT F-1

Leak Detection and Slack Line Operations Investigation and Action Plan Development and Implementation Status

March 1, 2011 through August 31, 2011

	CONSENT DECREE APPENDIX B PLM/CPM NAME	PIPELINE SEGMENT DESCRIPTION	CPM SYSTEM(S)	STATUS	INVESTIGATION			ACTION PLANS	
					FLOWING SLACK (bbls)	SHUT-IN SLACK (bbls)	REFILL TIME (min)	ACTION TAKEN TO DATE ¹	ACTION PLAN STATUS ²
1	RP_STSRP_DPTRP	Stroud to Dupont Terminal 10" Bypass - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	10-15	DTAs Configured	Complete
2	EP_ELPEP_ABQEP	El Paso to Albuquerque - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	100-700	30-60	2 CVs installed, DTAs configured, LPC added	Complete
3	BS_WFL_CSH	Basin Wichita Falls to Cushing - O/S	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	0-640	0-3230	10-20	CV installed, DTAs configured, RTTM Installed	Complete
4	BS_COL_WFL	Basin Colorado City to Wichita Falls - O/S	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	0	3,000-7,500	10-50	DTAs configured, Meter installed, RTTM Installed	Complete
5	LN2000/63	Line 2000/63 SSP	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	0	550	60	DTAs Configured*	Complete
6	RP_STSRP_RCTRP	Stroud to Rapid City Terminal 6" - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	10-50	15-60	DTAs Configured*	Complete
7	RP_STSRP_CHTRP	Stroud to Cheyenne Terminal 8" - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	10-30	10-15	DTAs Configured	Complete
8	TL_MED_OKI	Tulsa - Medford to Oki Junction - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	30-90	DTAs Configured	Complete
9	RP_NCSRP_RCTRP	New Castle to Rapid City Terminal 6" - O/S (inc WRC 8")	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0-30	0-15	DTAs Configured	Complete
10	RR_YTS_HLD	Yantis to Healdton	OASyS 7 DNA PLM	API RP 1130 Compliant	0	200-300	60-90	Δ Ops Procedure, DTAs Configured	Complete
11	RR_HLD_RCS	Healdton to Cushing	OASyS 7 DNA PLM	API RP 1130 Compliant	0 [#]	0 [#]	30 [#]	DTAs Configured	In Development
12	BOAC	Bay Marchand/Ostrica to Alliance - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	30	DTAs Configured	Complete
13	SCS_BRM	Bumpas Coffeyville to Broom	OASyS 7 DNA PLM	API RP 1130 Compliant	0	170	30	DTAs Configured	Complete
14	RP_CHTRP_DPTRP	Cheyenne South to Dupont - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	10-15	DTAs Configured	Complete
15	BS_BJL_BML	Basin Jal to Basin Midland - O/S	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	0	2750	20	Meter ordered, CV installed, DTAs configured, RTTM Installed	In Progress
16	BS_BML_COL	Basin Midland to Colorado City - O/S	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	0	3800-4000	30-45	2 Meters ordered, DTAs configured, RTTM Installed	In Progress
17	RP_CMSRP_FOTRP	Commerce City to Fountain - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	50-75	150-200	30-60	Δ Ops Procedure, DTAs Configured	Complete
18	PB_WSN_WOD	Wasson to West Odessa - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	600	25	DTAs Configured	Complete
19	BF_SKH_BLN	Stockholm to Blaine O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	665	665-950	60-90	DTAs Configured	In Development
20	MG_TEN_LUM	Ten Mile to Lumberton 14"	OASyS 7 DNA PLM	API RP 1130 Compliant	0	75	25	DTAs Configured	Complete
21	MG_LUM_EUT_L2	Eucutta to Lumberton Line 2	OASyS 7 DNA PLM	API RP 1130 Compliant	150	150-200	30	DTAs Configured	In Progress
22	CW_PKE_WRV	Capwood - Patoka East to Wood River - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	370	30	DTAs Configured	Complete
23	MG_LUM_EUT_L3	Lumberton to Eucutta line 3	OASyS 7 DNA PLM	API RP 1130 Compliant	50	75	25-30	RTU ordered, DTAs Configured	In Progress
24	BF_HAR_SKH	Harpers Ranch to Stockholm - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	150	175-200	60-90	Meter & RTU ordered, DTAs Configured	In Progress
25	CS_ORN_CAL	Orion to Calumet	OASyS 7 DNA PLM	API RP 1130 Compliant	120	600	120	BV & CV ordered, DTAs Configured	In Progress
26	CAM1	Clovelly to Alliance / Murphy - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	15	None Required	Complete
27	CA_PNTCA_EMDCA	Pentland to Emidio - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	200	10	DTAs Configured	Complete
28	CS_CAS_CCJ	CASHION CASHION - CIMARRON - CUSHING O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	600-900	30-40	DTAs Configured	In Development
29	CS_BLN_CAS	Blaine to Cashion - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	800	45	DTAs Configured	In Development
30	CH_OKY_CUS	Oklahoma to Cushing	OASyS 7 DNA PLM	API RP 1130 Compliant	0	775	80	DTAs Configured	In Development
31	CA_LSFCA_PNTCA	Las Flores to Pentland - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	430	550	20	Δ Ops Procedure, DTAs Configured	Complete
32	KE_GOR_BUS	Gorham to Schurr	OASyS 7 DNA PLM	API RP 1130 Compliant	0-400	400	60-90	CV & 3 Meters ordered, DTAs Configured	In Progress

ATTACHMENT F-1

Leak Detection and Slack Line Operations Investigation and Action Plan Development and Implementation Status

March 1, 2011 through August 31, 2011

	CONSENT DECREE APPENDIX B PLM/CPM NAME	PIPELINE SEGMENT DESCRIPTION	CPM SYSTEM(S)	STATUS	INVESTIGATION			ACTION PLANS	
					FLOWING SLACK (bbls)	SHUT-IN SLACK (bbls)	REFILL TIME (min)	ACTION TAKEN TO DATE ¹	ACTION PLAN STATUS ²
33	CS_ELK_COY	Elk City to Colony	OASys 7 DNA PLM	API RP 1130 Compliant	0	100-300	5-10	None Required	Complete
34	SP_SDWSP_KCXSP	Sulfur Draw to Ken Cox - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	5-10	None Required	Complete
35	CS_VER_CAL	Verdon to Calumet	OASys 7 DNA PLM	API RP 1130 Compliant	0	70	30-60	DTAs Configured	In Development
36	GM_GMD_HMA	Golden Meadow to Liretta	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	10-20	DTAs Configured	Complete
37	SHI_PLM1	Sandhills to Crane	OASys 7 DNA PLM	API RP 1130 Compliant	500	500	150	Meter, & RTU ordered, DTAs Configured	In Progress
38	C_PLM08	Delek to Tyler	OASys 7 DNA PLM	API RP 1130 Compliant	10	100	40	MOV ordered, DTAs Configured	In Progress
39	ND_RHM_MRM	Rhame to Marmarth	OASys 7 DNA PLM	API RP 1130 Compliant	550	550	60	CV ordered	In Progress
40	AT_TRU_SHG	Trunkline to Shell Gibson	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	5	DTAs Configured	Complete
41	FD_RBU_CBK	Ross Bayou to Canebrake	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	DTAs Configured	Complete
42	SP_CSRSP_DRVSP	Coates to Driver - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	DTAs Configured	Complete
43	KW_TRN_HRN	Trenton - Herndon O/S	OASys 7 DNA PLM	API RP 1130 Compliant	320	450	240	CV & Meter ordered, DTAs Configured	In Progress
44	ND_MRM_BAK	Marmarth to Baker	OASys 7 DNA PLM	API RP 1130 Compliant	700-1000	700-1000	30-45	DTAs Configured	In Progress
45	KE_NES_HOG	Ness City - Riverside - Hodgeman O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	75-250	60-120	CV & Meter ordered, DTAs Configured	In Progress
46	RR_HWK_QMN	Hawkins to Quitman	OASys 7 DNA PLM	API RP 1130 Compliant	0	20-40	10-15	DTAs Configured	Complete
47	BF_KAU_ORN	Kaufman to Orion - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
48	MG_CHU_TEN	Chunchula to Ten Mile	OASys 7 DNA PLM	API RP 1130 Compliant	0	150-200	15-20	DTAs Configured	Complete
49	GM_CAI_COC	Cailou Island to Cocodrie	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
50	SP_TIPSP_SPBSP	Tippett to Patterson - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	10	None Required	Complete
51	C_PLM23_CRSA	Crain Ranch to Sabine	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
52	MG_EUT_YCK	Eucutta to Yellow Creek	OASys 7 DNA PLM	API RP 1130 Compliant	0	120-160	10-20	DTAs Configured	Complete
53	SP_WESNJ_CGVRW	Westbrook to China Grove - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	10-30	10	None Required	Complete
54	AR_HAY BUM	Arklatex	OASys 7 DNA PLM	API RP 1130 Compliant	0	100-300	30	Δ Ops Procedure, DTAs Configured	In Progress
55	SP_FLD_MIDSP	Floyd to Midland - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	5-20	3-5	None Required	Complete
56	CA_BELCA_LIGHT	Belridge Light Incoming - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
57	AT_BDK_PAP	Burns Dock to Patterson	OASys 7 DNA PLM	API RP 1130 Compliant	0	20-40	5-10	DTAs Configured	Complete
58	MG_TEN_MOS	Ten Mile to Mobil Ship 14"	OASys 7 DNA PLM	API RP 1130 Compliant	450	450	15-45	DTAs Configured	In Progress
59	PG_10GPG_LAKPG*	EKV/LAK/COL via L65	OASys 7 DNA PLM	API RP 1130 Compliant	370	370	60	CV ordered	In Progress
	PG_10GPG_LAKPG	EKV/LAK/COL via L50	OASys 7 DNA PLM	API RP 1130 Compliant	170	170	20	CV ordered	In Progress
60	RR_QMN_YTS	Quitman to Yantis	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	DTAs Configured	Complete
61	SP_GLCSP_MIDSP	Glasscock to Midland - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	0-30	10-20	DTAs Configured	Complete
62	SP_OWNSP_BLLSP	Owens to Ball - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	115	150-200	30-60	DTAs Configured	In Progress
63	NM_DLH_JAL	Dollarhide to Jal	OASys 7 DNA PLM	API RP 1130 Compliant	0	225-300	60	Δ Ops Procedure, DTAs Configured	Complete
64	C_PLM12_PWFL	Powell to Floyd - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	50-150	10-20	DTAs Configured	Complete
65	SP_GRWSP_MIDSP	Greenwood to Midland - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	10-20	5	None Required	Complete
66	CH_HWT_TSY	Cherokee Hewitt to Tussy	OASys 7 DNA PLM	API RP 1130 Compliant	0	775	80	DTAs Configured	In Development
67	EI_BUR_DCK	Burns Terminal to Burns Dock	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
68	CA_ALHCA_BELCA	Aera Lost Hills to Belridge - O/S	OASys 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete

ATTACHMENT F-1

Leak Detection and Slack Line Operations Investigation and Action Plan Development and Implementation Status

March 1, 2011 through August 31, 2011

	CONSENT DECREE APPENDIX B PLM/CPM NAME	PIPELINE SEGMENT DESCRIPTION	CPM SYSTEM(S)	STATUS	INVESTIGATION			ACTION PLANS	
					FLOWING SLACK (bbls)	SHUT-IN SLACK (bbls)	REFILL TIME (min)	ACTION TAKEN TO DATE ¹	ACTION PLAN STATUS ²
69	CH_TSY_OKY	Tussy to Oklahoma City	OASyS 7 DNA PLM	API RP 1130 Compliant	0	775	80	DTAs Configured	In Development
70	AT_COA_PAP	Coastal to Patterson Pump	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	5	None Required	Complete
71	SP_HNYSP_CSRSP	Hanley to Coates Ranch	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
72	RP_DPTRP_CMSRP_SOUTH	Dupont - Commerce City South - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
73	RP_CMSRP_DPTRP	Commerce City to Dupont North - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
74	BS_CFL_CNC	Basin Conoco Falls to Conoco - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	5	None Required	Complete
75	JP_ELPJP_JUAJP	El Paso to Juarez - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	10-20	5	DTAs Configured	Complete
76	CFD_PLM4	Cranfield Truck to Cranfield	OASyS 7 DNA PLM	API RP 1130 Compliant	0	20-30	5-10	None Required	Complete
77	PG_LAKPG_KEYPG	Lake to Kelly 10" Line 1 - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	5	None Required	Complete
78	ST_GWS_VLO	George West to Valero	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	3	None Required	Complete
79	PG_EDACA_LAKPG	Derby to Lake 8" Line 2 - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	300	300	60	DTAs Configured	In Progress
80	BRGLK_BUR	Bridger Lake Station 8 to Burns Terminal - O/S	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	5	None Required	Complete

+ The corrective action that was taken for LN2000/63 and RP_STSRP_RCTRP was misreported in the previous semi-annual report. This has since been corrected.

The flowing slack, shut-in slack, and refill time for RR_HLD_RCS were misreported in the previous semi-annual report. These values have since been corrected.

*PG_10GPG_LAKPG was divided into 2 separate PLMs -- PG_18EPG_L65PG and PG_10GPG_L50PG -- in order to improve the fidelity of the leak detection on that segment.

¹ Action Taken To Date

In Development: Measure(s) to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection systems is being determined.

None Required: No action required. Current CPM leak detection tolerances are adequate or Slack-Line Operations are not present.

Δ Ops Procedure: Operating procedures for the applicable Segments of Pipeline including the "start-up" and "shut-in" procedures have been revised.

BV, CV, MOV ordered/installed: Block valves (BV), Motor operated valves (MOV), or pressure control devices (CV) have been installed.

DTAs Configured: CPM alarm limits have been adjusted to account for the expected refilling of the slack volumes.

LPC Added: Line-pack correction has been added to the CPM to compensate for changes in pipeline inventory.

Meter ordered/installed: Meter has been installed to improve the line balance between the originating and terminating stations.

RTTM Installed: Real time transient model has been configured to provide enhanced leak detection on the pipeline segment.

RTU ordered/installed: Remote Terminal Unit has been installed at a field site in order to transmit recorded pressure and/or flow and/or temperature measurements back to SCADA.

² Action Plan Status

In Development: Action Plan is being developed. Measure(s) to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection systems is being determined; some measures may be implemented prior to an action plan being developed.

In Progress: Action Plan has been developed and the measures to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection system is being implemented.

Complete: Action Plan has been developed and the measures to minimize Slack-Line Operations and/or mitigate the effects of Slack-Line Operations on the CPM leak detection system have been implemented.

ATTACHMENT F-2

Leak Detection and Slack Line Operations Investigation and Action Plan Development and Implementation Status Additional 30 Pipeline Segments

ATTACHMENT F-2

Leak Detection and Slack Line operations Investigation and Action Plan Development and Implementation Status

March 1, 2011 through August 31, 2011

	CONSENT DECREE ADDITIONAL 30 SEGMENTS OF PIPELINE PLM/CPM NAME	PIPELINE SEGMENT DESCRIPTION	CPM SYSTEM(S)	STATUS	INVESTIGATION			ACTION PLANS	
					FLOWING SLACK (bbls)	SHUT-IN SLACK (bbls)	REFILL TIME (min)	ACTION TAKEN TO DATE ¹	ACTION PLAN STATUS ²
1	AK_HSSAK_CCVAK	Haynesville Storage to Calumet/Cotton Valley	OASyS 7 DNA PLM	API RP 1130 Compliant	0	60-90	30	DTAs Configured	In Progress
2	AT_S62AT_SHGAT	Station 62 to Shell Gibson	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
3	BC_VNCBC_CHV	Venice to Chevron	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	0	DTAs Configured	Complete
4	CA_BELCA_PGSCA	Belridge to Pentland	OASyS 7 DNA PLM	API RP 1130 Compliant	300	1800	120	CV & RTU ordered	In Progress
5	CH_HWTCH_NUSCH	Hewitt to NuStar	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
6	CW_PTT_PTK	Patoka Truck to Patoka Station	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
7	DK_FBGD_DDGDK	Fryburg to Dodge	OASyS 7 DNA PLM	API RP 1130 Compliant	300	300-400	120	CV installed, DTAs Configured	In Progress
8	FR_CBKFR_CDFDR	Canebrake to Cranfield	OASyS 7 DNA PLM	API RP 1130 Compliant	0	150	20	Δ Ops Procedure, DTAs	In Progress
9	FR_DLDFR_CBKFR	Delhi Denbury to Canebrake	OASyS 7 DNA PLM	API RP 1130 Compliant	0	25	10-15	DTAs Configured	Complete
10	HB_TOMHB_JALNM	Thomas to Jal	OASyS 7 DNA PLM	API RP 1130 Compliant	0	300-700	300-420	Δ Ops Procedure, DTAs Configured	Complete
11	L2_LAP63_WHY63	LA Pump to West Hynes	SimSuite, OASyS 7 DNA PLM	API RP 1130 Compliant	0	150-400	30	CV Installed, DTAs Configured, Meter Installed	Complete
12	MG_BAYMG_HLBMG	Bay Springs to Heidelberg	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	10	RTU Installed	Complete
13	RL_ROBRL_STYRL	Robinson Lake to Stanley	OASyS 7 DNA PLM, ATMOS Pipe	API RP 1130 Compliant	0	0	0	DTAs Configured	Complete
14	RN_CASRN_FLMRN	Casper to Guernsey/Ft Laramie	OASyS 7 DNA PLM	API RP 1130 Compliant	0	120	20	DTAs Configured	Complete
15	RN_EDGRN_SCKRN	Edgerton to Salt Creek	OASyS 7 DNA PLM	API RP 1130 Compliant	0	120	18	DTAs Configured, RTU Installed	Complete
16	RN_FLMRN_CHERN	Ft Laramie to Cheyenne	OASyS 7 DNA PLM	API RP 1130 Compliant	0	300-500	30-40	CV ordered, DTAs Configured	In Progress
17	RN_GRYRN_FLMRN_24	Guernsey to Ft Laramie 24"	OASyS 7 DNA PLM	API RP 1130 Compliant	100-2000	1500-2100	60-90	CV ordered, DTAs Configured	In Progress
18	RN_HAMRN_KBSRN	Hamilton Dome to Kirby	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	55	DTAs Configured	Complete
19	RN_RENRN_SCKRN	Reno to Salt Creek	OASyS 7 DNA PLM	API RP 1130 Compliant	80	80	15	Δ Ops Procedure, DTAs	In Progress
20	RN_SCKRN_CASRN	Salt Creek to Casper	OASyS 7 DNA PLM	API RP 1130 Compliant	0	1200	270	CV ordered, DTAs Configured	In Progress
21	RS_GRGRS_WAHRs	Granger to Wahsatch	OASyS 7 DNA PLM	API RP 1130 Compliant	200	600	45	CV ordered, DTAs Configured	In Progress
22	RS_ILSRs_WAMRS	Iles to Wamsutter	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	30-40	DTAs Configured	Complete
23	RS_LBPRs_GRRs	LaBarge to Granger	OASyS 7 DNA PLM	API RP 1130 Compliant	600	875	150	CV installed, DTAs Configured	Complete
24	RS_WAMRS_GRGRs	Wamsutter to Granger	OASyS 7 DNA PLM	API RP 1130 Compliant	0	500	120	Δ Ops Procedure, DTAs	Complete
25	SL_BSESL_COCSL	Bay St Elaine to Cocodrie	OASyS 7 DNA PLM	API RP 1130 Compliant	0	0	0	None Required	Complete
26	SP_DRVSP_MCTIR	Driver to McCamey	OASyS 7 DNA PLM	API RP 1130 Compliant	0	50-150	25-60	DTAs Configured	In Progress
27	WT_GOLWT_MIDWT	Goldsmith to Midland #1 10"	OASyS 7 DNA PLM	API RP 1130 Compliant	0	200-500	40	DTAs Configured	In Progress
28	WT_GOLWT_MIDWT_PMT	Goldsmith to Midland #2 8"	OASyS 7 DNA PLM	API RP 1130 Compliant	0	100-200	15-30	CV Installed, DTAs Configured	Complete
29	WT_MCTIR_MIDIR	McCamey to Midland	OASyS 7 DNA PLM	API RP 1130 Compliant	0	200	20	DTAs Configured	Complete
30	WT_MIDMP_CCYMP	Midland Mesa to Colorado City	OASyS 7 DNA PLM	API RP 1130 Compliant	5000	7000	120	2 CVs Installed, DTAs Configured	In Progress

ATTACHMENT F-2

Leak Detection and Slack Line operations Investigation and Action Plan Development and Implementation Status

March 1, 2011 through August 31, 2011

¹ Action Taken To Date

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some measures may be implemented prior to an action plan being developed.

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